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(Pro Hac Vice Application to be Submitted)

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*Attorneys for Defendants FREMANTLE
PRODUCTIONS NORTH AMERICA, INC. and
MARATHON PRODUCTIONS, INC.*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

RUSSEL G. GREER,

Plaintiff,

v.

FREMANTLE PRODUCTIONS NORTH
AMERICA, INC, a corporation and
MARATHON PRODUCTIONS, INC, a
corporation,

Defendants.

Case No. 2:21-cv-01905-RFB-NJK

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND TIME TO
RESPOND TO AMENDED MOTION
FOR PRELIMINARY INJUNCTION
[ECF NO. 27]**

Plaintiff Russell G. Greer ("Greer"), in pro per person, and Defendants Fremantle Productions North America, Inc. and Marathon Productions, Inc. (collectively, "Fremantle"), by and through counsel, hereby agree and stipulate as follows:

WHEREAS, on January 28, 2022, Greer filed an Amended Motion for a Preliminary Injunction (the "PI Motion"), *see* ECF 27;

WHEREAS, Fremantle's deadline to oppose the PI Motion is February 11, 2022;

WHEREAS, Fremantle intends to move to compel arbitration and will file such motion on or before February 7, 2022;

1 WHEREAS, the Parties agree that—for party and judicial efficiency—the Court should
2 resolve Fremantle’s forthcoming Motion to Compel Arbitration before resolving the PI Motion;

3 WHEREAS, the Parties agree that Fremantle should not oppose the PI Motion until and
4 unless the Court denies Fremantle’s Motion to Compel Arbitration and that Fremantle shall have
5 at least two weeks from such order to oppose the PI Motion in such event;

6 WHEREAS, the Parties otherwise reserve all rights.

7 Dated this 3rd day of February 2022.

Dated this 3rd day of February 2022. H1

8 RUSSELL G. GREER

LAW GROUP

9 /s/ Russell G. Greer

/s/ Joel Z. Schwarz

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15 *Pro Se Litigant*

Attorneys for Defendants

16 **IT IS SO ORDERED:**

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18 UNITED STATES DISTRICT JUDGE

19 **DATED:** _____
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